

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Midland Funding LLC,)	CASE NO.: 3:08-cv-01434
)	
Plaintiff,)	JUDGE: Katz
)	
vs.)	
)	
Andrea Brent,)	
)	
Defendant,)	
)	
vs.)	
)	
Midland Credit Management, Inc.)	
)	
Third-Party Defendant)	
)	

**Plaintiff and Third-Party Defendant's
Motion to Exceed Page Limitations**

Now comes Plaintiff Midland Funding LLC (“Midland”), and Third-Party Defendant Midland Credit Management, Inc. (“MCM”), by and through undersigned counsel, and pursuant to Local Rule of Civil Procedure 7.1(f), requests that this Court permit them to file a memorandum in support of their Motion for Summary Judgment which exceeds the twenty page limitation set forth by the local rules. Like Defendant, Midland and MCM will file a memorandum in support no longer than 26 pages in length. This request is being made for the followings reasons:

- Local Rule 7.1 sets a 20 page limitation for any memorandum in support of a dispositive motion, and prior approval to exceed such limitation for good cause.
- This is a complex case involving novel propositions of law, deserving of extended discussion.
- Midland and MCM will be filing a joint motion. As such, each party is inherently giving up the right to file its own motion, such that the actual motion filed is more logically sequenced,

and will absolve the need to make reference to each other's motion. By doing so, the parties are effectively reducing their page limitations from a combined 40 pages, to 20 pages.

- Defendant has also requested a page extension. Doc. No. 28, which has been granted. Doc. No. 29. Midland and MCM merely request the same consideration.

Wherefore, Midland and MCM respectfully pray that they be permitted to file their joint motion for summary judgment, with a memorandum in support to not exceed twenty-six pages.

Respectfully Submitted,

/s/ R. Glenn Knirsch
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Certificate of Service

I hereby certify that on February 13, 2009 a copy of the foregoing was filed electronically in accordance with the Court's Electronic Filing Guidelines. Notice of this filing will be sent to the parties, by operation of the court's electronic filing system. Parties may access this filing through the court's system.

/s/ R. Glenn Knirsch
R. Glenn Knirsch, SCR#0080770